

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<p>NANCY LUDWIG and JOSEPH SPILLANE, on behalf themselves and all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>FCA US LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No.: 3:24-cv-08906-RK-RLS</p>
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MOTION TO WITHDRAW MARK I. RICHARDS AS COUNSEL FOR PLAINTIFFS

TO THE COURT AND ALL PARTIES:

COMES NOW, Michele M. Vercoski, attorney of the law firm McCune Law Group, APC, who represents to this Court the following:

1. McCune Law Group, APC, by and through its attorneys were retained by Plaintiffs Nancy Ludwig and Joseph Spillane for legal representation.
2. On August 30, 2024, Plaintiffs filed their Class Action Complaint.
3. On September 17, 2024, Mark I. Richards filed his Motion for Admission Pro Hac Vice.
4. On October 22, 2024, this Court granted *Pro Hac Vice* admission of Mark I. Richards as additional counsel on behalf of Plaintiffs Nancy Ludwig and Joseph Spillane.
5. As of October 18, 2024, Mark I. Richards is no longer associated with the firm

McCune Law Group, APC.

6. Movants' withdrawal will not cause any prejudice or delay in this case. All parties have counsel active in their representation, who will not require any additional time to review or acclimate to the absence of Movants as counsel.

WHEREFORE, McCune Law Group respectfully request that this Court grant their Motion to Withdraw Mark I. Richards as Counsel for Plaintiffs in this action.

All other listed counsel shall remain the attorneys of record for Plaintiff in this action.

Dated: October 28, 2024

Respectfully Submitted:

By: /s/ Michele M. Vercoski

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